

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES MACK,

Defendant.

Case No. 15-00407-02-CR-W-HFS

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR EARLY
TERMINATION OF SUPERVISED RELEASE**

Comes now the United States of America, by and through its undersigned counsel, and responds to Mack's Motion to Terminate Supervised Release. The Government states the following in support of this motion:

1. James Mack pled guilty to one count of conspiracy to distribute 100 kilograms or more of marijuana and one count of money laundering on August 18, 2017. A presentence report was ordered and sentencing was ultimately set for March 6, 2018. (D.E. 66, 98, and 100.)

2. Defendant Mack was sentenced to 60 months on each count, concurrently with each other, and four years of supervised release on Count One and three years of supervised release on Count Two, following his release from the Bureau of Prisons, along with the standard conditions of supervised release, special conditions of supervision, and \$100.00 in mandatory special assessments. (D.E. 100.)

3. Defendant Mack filed a motion to terminate his Supervised Release on February 13, 2024 (D.E. 147). On February 20, 2024, Probation filed a memorandum stating they are against early release of supervision. (D.E.148.) In their memorandum, Probation states that since Mack submitted a home plan that was acceptable, they have had difficulties contacting Mack at

the address he is supposed to be living. Probation believes Mack is not being truthful regarding his residence status. In fairness, Probation also states Mack maintains full time employment and submits to monthly supervision reports as required. All his drug tests have been negative. Mack has satisfied all financial obligations and has not incurred any violations of his supervised release.

4. Accordingly, the Government is requesting this court deny Mr. Mack's present motion for early termination of supervision.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Government respectfully request this Court deny Mack's motion.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By */s/ Joseph M. Marquez*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on February 26, 2024, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record and to the defendant at the below E-Mail address:

MackT467@gmail.com

/s/ Joseph M. Marquez

Joseph M. Marquez

Assistant United States Attorney